

## **REMARKS**

Applicants appreciate the Examiner's thorough consideration provided the present application. Claims 1-5 are now present in the application. The specification, drawings, and claims 1-5 have been amended. Claim 1 is independent. Reconsideration of this application, as amended, is respectfully requested.

### **Specification Objections**

The specification has been objected to due to the presence of minor informalities. In view of the foregoing amendments, it is respectfully submitted that this objection has been addressed. Reconsideration and withdrawal of this objection are respectfully requested.

A Substitute Specification is attached hereto. This statement is included in accordance with 37 C.F.R. § 1.125 to indicate that it is the undersigned's belief that no new matter has been included in the Substitute Specification.

A comparison version of the specification is provided. This comparison document indicates all additions and deletions to the originally filed specification. Applicants respectfully submit that the Substitute Specification includes the same changes as are indicated in the comparison document which compares the originally filed specification to the amended specification or Substitute Specification.

### **Drawings Objections**

The drawings have been objected to the presence of minor informalities.. Applicants have submitted five (5) sheets of corrected formal drawings to address the Examiner's requested changes. Accordingly, Applicants respectfully submit that this objection has been obviated and/or rendered moot. Reconsideration and withdrawal of the objection are respectfully requested.

### **Claim Rejections Under 35 U.S.C. §112**

Claim 4 stand rejected under 35 U.S.C. § 112, first paragraph, as failing to comply with the enablement requirement. Claims 3 and 4 stand rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicants regard as the invention. These rejections are respectfully traversed.

In view of the foregoing amendments, it is respectfully submitted that these rejections have been addressed. Accordingly, all pending claims comply with the enablement requirement and are now definite and clear. Reconsideration and withdrawal of the rejection under 35 U.S.C. § 112, first and second paragraphs, are therefore respectfully requested.

### **Claim Rejections Under 35 U.S.C. §§ 102 & 103**

Claims 1, 2 and 5 stand rejected under 35 U.S.C. § 102(b) as being anticipated by Heiberger, U.S. Patent No. 5,341,489. Claim 3 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Heiberger in view of Pua, U.S. Patent Application Publication No. US

2002/0147882. Claim 4 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Heiberger in view of Applicants' disclosure. These rejections are respectfully traversed.

In light of the foregoing amendments to the claims, Applicants respectfully submit that this rejection has been obviated and/or rendered moot. As the Examiner will note, independent claim 1 has been amended to recite a combination of steps including "the step of writing one of the sectors into one page of one of the blocks includes: defining the one of the blocks as a mother block; selecting a backup block as a child block; assigning the child block a logical address same as a logical address of the mother block; reading out a plurality of pages prior to the one page into which the sector to be written from the mother block and writing the plurality of pages prior to the one page into the child block; and writing the one of the sectors into the one page". Support for the above combination of steps can be found on paragraph 0058 of the specification. Applicants respectfully submit that the above combination of steps as set forth in amended independent claim 1 is not disclosed nor suggested by the references relied on by the Examiner.

The Examiner has correctly acknowledged that Heiberger fails to teach the mother-child memory structure. The Examiner turned to rely on Pua's mother/child blocks on paragraph 0033. However, Pua in paragraph 0033 merely discloses that the child block number 03E0h is filled into the mother block's logical block address 0000h. Pua fails to teach "reading out a plurality of pages prior to the one page into which the sector to be written from the mother block and writing the plurality of pages prior to the one page into the child block; and writing the one of the sectors into the one page" as recited in amended claim 1.

With regard to the Examiner's reliance on Applicants' disclosure, it has only been relied on for its teachings related to the subject matter of claim 4. It also fails to disclose the above combination of steps as set forth in amended independent claim 1. Accordingly, it fails to cure the deficiencies of Pua.

Accordingly, none of the references utilized by the Examiner individually or in combination teach or suggest the limitations of amended independent claim 1 or its dependent claims. Therefore, Applicants respectfully submit that claim 1 and its dependent claims clearly define over the teachings of the references relied on by the Examiner.

Accordingly, reconsideration and withdrawal of the rejections under 35 U.S.C. §§ 102 and 103 are respectfully requested.

### **CONCLUSION**

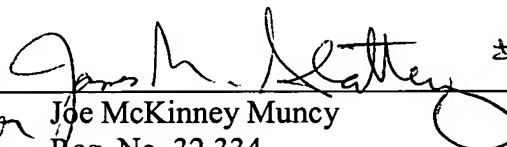
It is believed that a full and complete response has been made to the Office Action, and that as such, the Examiner is respectfully requested to send the application to Issue.

In the event there are any matters remaining in this application, the Examiner is invited to contact Joe McKinney Muncy, Registration No. 32,334 at (703) 205-8000 in the Washington, D.C. area.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to Deposit Account No. 02-2448 for any additional fees required under 37 C.F.R. §§1.16 or 1.17; particularly, extension of time fees.

Respectfully submitted,

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### **AMENDMENTS TO THE DRAWINGS**

Attached hereto are five (5) sheets of corrected formal drawings that comply with the provisions of 37 C.F.R. § 1.84. The corrected formal drawings incorporate the following drawing changes:

In FIG. 4, the reference numerals 4-1, 4-2, 4-3 and 4-6 have been re-directed to the corresponding objects; the reference numerals 4-4 and 4-5 have been removed; and the label “I\_Zone0 (4-42) of I\_Block0(4-41)” have been replaced by “I\_Block0 (4-42) of I\_Zone0 (4-41)”.

In FIG. 6A, the labels “Plane0(I\_C\_Zone0)(6-10)” and “Plane1(I\_C\_Zone1)(6-20)” have been relocated.

In FIG. 6B, the labels “Plane2(I\_C\_Zone2)(6-20)” and “Plane3(I\_C\_Zone3)(6-30)” have been relocated.

In FIG. 7, the label “the actual address of the flash memory corresponding to the physical address” has been replaced by “find the actual address of the flash memory corresponding to the physical address”.

In FIG. 8, the label “whether is CHS or LBA is detarmind” has been replaced by “CHS or LBA?”.

It is respectfully requested that the corrected formal drawings be approved and made a part of the record of the above-identified application.